

PTH:RMP
F. #2016R02001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ANOWAR HOSSAIN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH MARCUS, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

In or about November 2015, within the Eastern District of New York and elsewhere, the defendant ANOWAR HOSSAIN did knowingly and intentionally devise a scheme and artifice to defraud the United States Postal Service, and to obtain money and property from it by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did knowingly and intentionally transmit and cause to be transmitted, by means of wire communications in interstate commerce, writings, signs, signals, and pictures, to wit: a fraudulent parcel insurance claim and falsified proof of value submitted through the United States Postal Service internet portal.

(Title 18, United States Code, Sections 1343 and 3551 et seq.)

TO BE FILED UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR AN
ARREST WARRANT

(18 U.S.C. §§ 1343 and 3551 et seq.)

Case No. 20-MJ-1064

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Postal Inspector with the United States Postal Inspection Service and have been involved in the investigation of numerous cases involving fraudulent schemes using the mail and the internet, among other things. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and documentary evidence; and from reports of other law enforcement officers involved in the investigation.

2. Between approximately 2013 and 2016, ANOWAR HOSSAIN operated a scheme to defraud the United States Postal Service ("U.S.P.S.") by mailing insured packages and submitting at least 15 fraudulent insurance claims, totaling at least \$37,524.00 in claimed value. For at least 12 of those claims, the supporting documentation for which I have reviewed, HOSSAIN submitted as proofs of value purported PayPal receipts with PayPal transaction ID numbers. According to PayPal records that I have reviewed, those transaction ID numbers either correspond to no real transaction or to a transaction for a different item with far smaller value than claimed. As a result of these fraudulent claims, HOSSAIN received checks from the U.S.P.S. that he endorsed in his own name and/or deposited into his own bank accounts totaling at least \$29,444.50.

3. One such claim pertained to a small parcel (the "Parcel") that was mailed from a Post Office in Brooklyn, New York on October 31, 2015. According to the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

sales receipt, U.S.P.S. records, and credit card company records, which I have reviewed, the postage and insurance for the Parcel were purchased using a credit card that belongs to ANOWAR HOSSAIN.

4. According to the Parcel's mailing label, which I have reviewed, the Parcel was sent from a particular individual ("Identity-1") and to another particular individual ("Identity-2"), neither of whom is named ANOWAR HOSSAIN. The "From" address on the mailing label, which purports to be the address of Identity-1, is a residence in Brooklyn, which I know from property records, law enforcement databases, and other sources to be associated with ANOWAR HOSSAIN and to be the residence of certain of his relatives. The "To" address on the mailing label, which purports to be the address of Identity-2, is a residence in Queens, which I know from property records, law enforcement databases, and other sources to be the home of ANOWAR HOSSAIN.

5. According to U.S.P.S. records, which I have reviewed, on November 22, 2015, a person purporting to be Identity-1, but whom I believe to be ANOWAR HOSSAIN, transmitted through the U.S.P.S. internet portal an insurance claim (the "Claim") for \$2,499.00 on the alleged basis that the Parcel was "missing contents" upon delivery.

6. The claimant submitted a personal email address as an individual identifier for the Claim. That email address is the name of Identity-1, plus a numeral, at gmail.com. According to Google's records, which I have reviewed and compared to U.S.P.S. records related to the Claim, that free email account was created approximately 19 minutes before the Claim was submitted. Also according to Google's records, that account was created and accessed from a computer at a particular internet protocol address ("I.P. address"), which, according to the records of an internet service provider, which I have

reviewed, is associated with the subscriber account of ANOWAR HOSSAIN. A computer at that same I.P. address has also been used to access the online account for the credit card owned by ANOWAR HOSSAIN that was used to purchase the postage and insurance for the Parcel, according to the records of the credit card company.

7. The claimant transmitted with the Claim a picture of a certain document as proof of value for the claimed loss. That document, which I have reviewed, appears to be an Apple invoice or packing slip for the shipment of a particular model of iPhone to Identity-1 at an address in Toronto, Canada. The document indicates that the price of the iPhone was \$2,347.00, that the “G.S.T./H.S.T.”—which I understand to be the Canadian national Goods and Services Tax and provincial Harmonized Sales Tax—was \$152.00, and that the total was therefore \$2,499.00. That numerical value is the same as the numerical value of the Claim, although this document appears to reflect Canadian dollars and the Claim was made in United States dollars.

8. According to contemporaneous advertisements and press coverage of Apple product announcements, which I have reviewed, the cost indicated on the purported Apple invoice is far higher than the actual cost—whether quoted in Canadian or United States dollars—of the particular model of iPhone listed on the invoice. Additionally, the G.S.T./H.S.T. reflected on the purported Apple invoice (approximately 6.476%) is far lower than the actual G.S.T./H.S.T. charged in Ontario (13%).

9. According to Apple records, which I have reviewed, the order number on the purported Apple invoice corresponds to a real purchase by an individual in Toronto with the name used as Identity-1, but the purchased items and the cost are not the same as those reflected on the invoice submitted with the Claim.

10. I therefore respectfully submit that there is probable cause to believe that the purported Apple invoice was falsified for purposes of submitting a fraudulent insurance claim.

11. The U.S.P.S. requested from the claimant additional information to verify the Claim. On December 31, 2015, the claimant, purporting to be and signing the name of Identity-1, submitted by mail an additional proof of value in the form of a purported PayPal invoice. That invoice, which I have reviewed, appears to reflect payment of \$2,650.00 from Identity-2 to Identity-1 on October 30, 2015—one day before the mailing of the Parcel—for the purchase of a gold-plated iPhone (of a different model than the iPhone on the first proof of value), associated with a particular eBay “item ID,” and the shipment of that iPhone with the same tracking number as the Parcel.

12. According to eBay records that I have reviewed, the auction corresponding to the “item ID” that appears on the purported PayPal invoice was listed on December 28, 2015—approximately two months after the date that appears on the purported PayPal invoice and the shipment of the Parcel, and only three days before that purported invoice was submitted to the U.S.P.S. Additionally, the item description and price associated with that eBay auction are not the same as those that appear on the purported invoice.

13. According to PayPal, and PayPal records that I have reviewed, the “transaction ID” on the purported PayPal invoice corresponds to a real transaction, which was for the purchase of a different product for only \$4.99. Additionally, the Identity-1 email address, which appears as the seller email address on the purported PayPal invoice, is not registered to any PayPal account.

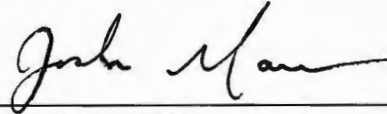
14. I therefore respectfully submit that there is probable cause to believe that the purported PayPal invoice was falsified for purposes of submitting a fraudulent insurance claim.

15. The U.S.P.S. approved the Claim for the depreciated value of \$2036.69 and issued a check payable to Identity-1. That check, an image of which I have reviewed, was endorsed with two signatures and deposited. One signature is in the name of Identity-1, and the other is the signature of ANOWAR HOSSAIN. The check was deposited into a bank account that, according to bank records that I have reviewed, belongs to ANOWAR HOSSAIN.

16. I therefore respectfully submit that there is probable cause to believe that ANOWAR HOSSAIN did knowingly and intentionally devise a scheme and artifice to defraud the United States Postal Service, and to obtain money and property from it by means of materially false and fraudulent representations, and for the purpose of executing such

scheme did knowingly and intentionally transmit by means of wire communications in interstate commerce, writings, signs, signals, and pictures.

WHEREFORE, your deponent respectfully requests that the defendant ANOWAR HOSSAIN, be dealt with according to law.



JOSEPH MARCUS
Postal Inspector
United States Postal Inspection Service

Sworn to before me by telephone
this 6 day of November, 2020



THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK